Applicant : John L. Farmer et al.                    Attorney's Docket No.: 07844-463001 / P427
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## REMARKS

Claims 1-58 were pending in the application. Claims 1, 3, 4, 6, 9-10, 12, 13, 15, 18-19,
21-22, 25, 28-29, 31, 33-35, 37-39, 41-45, and 50 have been amended. The amendments are
supported in the specification on at least page 15, lines 7-19, page 16, lines 5-11, and page 17,
lines 1-9. Claims 2, 5, 11, 14, 20, 23-24, 30, 49, and 54-58 have been canceled. Reconsideration
an reexamination are respectfully requested in view of the amendments to the claims and the
following remarks.

Claims 1-44 and 55-58 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S.
Pat. No. 6,223,191 to Truelson ("Truelson"). Claims 45-48 and 50-53 were rejected under 35
U.S.C. 102(a) as being anticipated by Microsoft's "Microsoft Word 2000". Claims 49 and 54
were rejected under 35 U.S.C. 103(a) as being unpatentable over Microsoft's "Microsoft Word
2000" in view of Truelson.

In rejecting claim 1, the Examiner, citing column 2, lines 50-68 of Truelson, states that
Truelson teaches a method for identifying possible lines within a paragraph in a top-down pass
through the paragraph. The Examiner further states, citing columns 11 & 12, lines 64-67 & 1-6
of Truelson, that Truelson teaches selecting a combination of possible lines in a bottom-up pass
through the possible lines. Finally, citing column 2, lines 61-64 of Truelson, the Examiner states
that Truelson teaches specifying a layout for the paragraph according to the selected
combination. The cited passages actually read as follows:

> In the preferred embodiment, an entire paragraph is formatted as a
> group. The formatter generates multiple permutations of possible
> formatted text lines, assigning a weighted value to each permutation.
> With each successive line of text, undesirable permutations are pruned. A
> permutation is pruned if it appears that it would cause the paragraph to
> format in more than the minimum number of lines; or if letter spacing has
> exceeded a given threshold; or if the weighted score is worse than the
> weighted score of another permutation which ends with the same word or
> word segment. The unpruned permutations are used to generate
> permutations of the next succeeding line of text. The set of permuted lines
> having the most desirable accrued weighted value within the
> predetermined minimum number of lines is chosen as the best formatting.

    In the preferred embodiment, the text formatter is one of the functions of a word processing program executing on a general purpose computer system. [column 2, lines 50-67]

    The formatter then reconstructs the formatted paragraph in optimal form by following the series of links in source permutation fields 243 back from Line 10C, saved as a BestLine (step 307). i.e., permutation 10C was generated from 9H, and the BestLine entry 241 of Line 10C contains a link to Line 9H in field 243. The entry for Line 9H similarly contains a link in its field 243 to Line 8F, which follows a successive chain of links to Lines 7F, 6B, 5A, 4A, 3D, 2F and 1B. The formatted paragraph in final form contains these lines, and is shown in FIG. 5B. [columns 11 & 12, lines 64-67 & 1-6]

    The method disclosed in Truelson includes generating multiple permutations of possible formatted text lines (column 2, lines 51-52). It further includes assigning a weighted value to each permutation (column 2, lines 53-54). As shown in FIGS. 6A-6J, the weighted value of a permutation of a given line is calculated with reference to weighted values of the permutations of preceding lines in the paragraph. For example, the weighted value of line 10C in FIG 6J is calculated with reference to the weighted value of line 9H in FIG. 6I-i. The weighted value of line 9H in FIG. 6I-i is in turn calculated with reference to the weighted value of line 8F in FIG. 6H-i. The weighted value of line 8F in FIG. 6H-i is in turn calculated with reference to the weighted value of line 7F, and so on. Accordingly, Truelson does not teach or suggest "calculating a bottom-up accrued penalty for each of the possible lines in the subset of possible lines in a bottom-up pass from the end to the beginning of [a] paragraph, each bottom-up accrued penalty for a particular line being calculated from the line-specific penalties of the particular line and all lines in an optimal sequence of lines from the particular line to the end of the paragraph, **each bottom-up accrued penalty being calculated without reference to any penalty for any preceding line in the paragraph,**" where "[a] line-specific penalty for each line [is] calculated **without reference to any penalty calculated for any other line,**" as recited in claim 1.

    The method disclosed in Truelson further includes choosing a set of permuted lines that have the most desirable accrued weighted value as the best formatting for a paragraph (column 2, lines 61-64). Accordingly, Truelson teaches choosing a set of permuted lines as the best
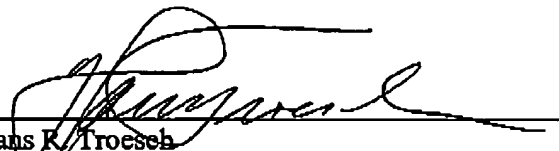
formatting for a paragraph based on the weighted values of the permuted lines, where the weighted value of a given permuted line is calculated with reference to a weighted value of a preceding permuted line. It follows that Truelson does not teach or suggest "selecting a combination of the possible lines based on the bottom-up accrued penalties of the possible lines; and specifying a layout for [a] paragraph according to the selected combination," as recited in claim 1. For at least these reasons, claim 1 and its dependent claims are allowable.

Claims 10, 19, 29, 33, 37, 41-42, and 50, as amended, recite limitations corresponding to those discussed above in reference to claim 1. Claims 10, 19, 29, 33, 37, 41-42, and 50 and their dependent claims are allowable for at least the reasons set forth in reference to claim 1.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

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